

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

IN RE:	)	
WILLIAM CHARLES BEVAN	)	
	)	Case No. 22-12609
Debtor	)	(Chapter 13)
	)	

**MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR AND AS COUNSEL TO  
AGENT IN FACT IN IMPLEMENTATION OF CONFIRMED CHAPTER 13 PLAN  
OF REHABILITATION AND REQUEST FOR WAIVER OF SEVEN (7) DAY  
NOTICE OTHERWISE REQUIRED BY LOCAL RULE 9010-4**

THE BURNS LAW FIRM, LLC (the "Firm"), by and through undersigned counsel to the Debtor, as counsel to the Agent in Fact, also referred to by the undersigned as the special purpose entity, Adam Ross Levin in implementation of confirmed Chapter 13 Plan of Rehabilitation, hereby moves to withdraw and strike his appearance because of the finding and conclusion of the Bankruptcy Court as of May 16, 2023, that there exists a conflict of interest which was caused by the deviation of the Debtor, William Charles Bevan, from the irrevocable and binding terms of his confirmed Chapter 13 Plan as set forth on the record, and the above referenced Firm must therefore withdraw its appearance, and the Firm seeks a waiver of the seven (7) day notice otherwise required by Local Rule 9010-4, and states as follows:

The Firm should be permitted to withdraw from the above captioned Chapter 13 case as counsel of record to the Debtor and in aid of implementation of the confirmed Chapter 13 Plan of Rehabilitation to the agent in fact or SPE Adam Ross Levin solely in his role as agent in fact. The withdrawal should be effective immediately given the statements made by Debtor contrary to his confirmed Plan in open court on May 16, 2023 and the Bankruptcy Court's finding and conclusion on May 16, 2023 that a conflict now exists given

those statements and positions taken by the Debtor. The Firm consents to the jurisdiction of the Bankruptcy Court in entering final Orders in this Chapter 13 case. No memorandum shall be filed to accompany this Motion pursuant to Local Rule 9013-2. A fee application shall be filed to the date of the Order releasing appearance and granting this Motion.

WHEREFORE, Firm respectfully requests that the Bankruptcy Court enter an Order: (i) Granting the Motion; (ii) Striking the appearance of the Firm as counsel in this Chapter 13 case and authorizing immediate withdrawal of the Firm herein with waiver of Local Rule 9010-4 notice; and (iii) Granting such other and further relief as equity and justice may require.

Respectfully Submitted,

-----/s/ John D. Burns-----

John D. Burns, Esq. #22777

The Burns Law Firm, LLC

6305 Ivy Lane, Suite 340

Greenbelt, MD 20770

(301) 441-8780

*Counsel for the Debtor and as to the Agent In Fact and  
SPE in implementation of the Plan*

*INFO@BURNSBANKRUPTCYFIRM.COM*

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 16, 2023, a copy of the Motion with Order was served upon the following as specified via ECF, EMAIL or via first-class mail postage prepaid to those parties listed on the attached creditor matrix and the following additional parties:

**By ECF Notification Upon:**

Timothy Branigan, Chapter 13  
Trustee 9891 Broken Land  
Parkway, Suite 301  
Columbia, MD 21046  
Chapter 13 Trustee

[dpesacho@siwpc.com](mailto:dpesacho@siwpc.com)

Dan Pesachowitz, Counsel for U.S. Bank / Fay Servicing

Leah Freedman [Leah.Freedman@bww-law.com](mailto:Leah.Freedman@bww-law.com)

Counsel for U.S. Bank / Fay Servicing

Parties registered for ECF notification

**BY ELECTRONIC MAIL:**

Jeanette Rice, Esquire  
Office of the United States Trustee  
6305 Ivy Lane; STE 340  
Greenbelt, MD 20770

Adam Ross Levin  
Homewise Realty Services, LLC  
11140 Rockville Pike  
Suite 420  
Rockville, MD 20852

Steinwedel, William [wsteinwedel@mdlab.org](mailto:wsteinwedel@mdlab.org)  
Legal Aid – Medical Placement Issues Counsel  
For Debtor

[williamrudow@rudowlaw.com](mailto:williamrudow@rudowlaw.com)

William Rudow, Esquire

[ugotmold@yahoo.com](mailto:ugotmold@yahoo.com)

Ivelin Kostadinov, Contractor

William C. Bevan, Debtor

[drwilliambevan@juno.com](mailto:drwilliambevan@juno.com)

**BY First Class Mail Postage Prepaid Upon:**

Dr. William Bevan  
ProMedica Skilled Nursing and Rehab (Manor Care)  
11901 Georgia Avenue  
Wheaton, MD 20902

-----/s/ John D. Burns-----

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6305 Ivy Lane, Suite 340  
Greenbelt, MD 20770  
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